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February 28, 2025

Via ECF

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Espinal, et al. v. Sephora USA, Inc., Case No. 1:22-cv-03034-PAE-GWG

Dear Judge Engelmayer:

I represent Plaintiffs in the above-captioned action and I write regarding Defendant Sephora USA, Inc.'s motion to stay discovery pending the outcome of *Grant v. Glob. Aircraft Dispatch, Inc.*, No. 2021-03202 (ECF No. 115-116). The parties have continued to meet and confer with respect to Defendant's motion. As a result of those efforts, the parties agree that a stay of discovery pending the outcome of *Grant* would be appropriate given the importance of *Grant*'s outcome on the instant matter. A stay would also conserve judicial and party resources while *Grant* is resolved, which the parties expect will be in the near future.

Accordingly, together with counsel for Defendant, the parties jointly request a stay of discovery pending the outcome of *Grant v. Glob. Aircraft Dispatch, Inc.* In the interim, the parties propose submitting periodic updates to the Court every 60 days to alert the Court of any developments. Thank you for your consideration.

Respectfully,

A handwritten signature in blue ink that reads 'Y. Kopel'.

cc: All counsel of record via ECF

Yitzchak Kopel